

# FSIS DIRECTIVE

6210.2,  
Revision 1

5/3/05

## INSPECTION OF POULTRY FEET THAT ARE PRESENTED AS ELIGIBLE TO RECEIVE THE MARK OF INSPECTION

### I. PURPOSE

This directive provides instructions to inspection program personnel for performing inspection activities on poultry feet that are presented as eligible to receive the United States Department of Agriculture (USDA) mark of inspection.

### II. CANCELLATIONS

FSIS Directive 6210.1, 12-19-2002

### III. REASON FOR REISSUANCE

This directive is being reissued to provide further instructions to inspection program personnel for the verification activities related to food safety and non-food safety conditions related to poultry feet.

### IV. REFERENCES

9 CFR 381.79

### V. BACKGROUND

Poultry feet qualify to receive the USDA mark of inspection when their identity is maintained with the carcass through the post-mortem carcass inspection process, and they are found to be not adulterated. Poultry carcasses or feet passed for human food may, in accordance with 9 CFR 381.79, receive the mark of inspection based on an examination of the feet as well as the carcass as a whole.

### VI. METHODS FOR PRODUCING FEET ELIGIBLE FOR THE MARK OF INSPECTION

A. Under Inspection System Procedure (ISP) activity code 04C01, inspection program personnel will verify that establishments that want to produce poultry feet that are eligible to bear the mark of inspection maintain the identity of the feet with the rest of the carcass from which the feet were derived for post-mortem inspection and disposition purposes by one of the following methods:

1. Expose the hock joints, leaving the feet attached to the carcass by a tendon or skin part, provided:

a. The feet do not obstruct the view of the carcass in such a way as to hinder the inspector's ability to perform the established post-mortem inspection procedure, and

b. Sanitary conditions are maintained.

2. Process detached poultry feet by a **batch method** that ensures that when a single carcass is condemned on postmortem, the correlative batch of feet collected in a separate location is condemned, provided:

a. The batch method procedure to be used is acceptable to the IIC, and

b. The procedure ensures that whenever inspection program personnel condemn a carcass at any post-mortem inspection station, the establishment employee immediately communicates the condemnation to management and the batch or lot containing the feet from the condemned carcass is disposed of and not used for human food.

**NOTE:** Establishments may perform identification and disposition of carcasses affected with systemic conditions before the carcass/feet separation. Such an approach is to be set out in the batch procedure description. Carcasses disposed of by establishment personnel are reported as plant rejects.

## **VII. POST-MORTEM INSPECTION PROCEDURES**

A. Inspection program personnel are to condemn carcasses, including the feet, that exhibit signs of systemic conditions that may render the carcass and its parts adulterated, e.g., septicemia/toxemia or leukosis complex, or of localized conditions with evidence of general systemic involvement, e.g., inflammatory process (IP) with general systemic disturbance.

B. Inspection program personnel are to pass carcasses, including the feet, with certain defects not requiring condemnation of the entire carcass (localized defects), e.g., localized airsacculitis or bruises, unless a profusion of these defects renders the poultry feet unsound and unfit to eat. Under any of the regulatory poultry slaughter systems (SIS, NELS, and NTI) except the Traditional Inspection System, localized defects are removed by establishment personnel subject to FSIS verification checks.

## **VIII. INSPECTION PROGRAM PERSONNEL VERIFICATION RESPONSIBILITIES RELATED TO FOOD SAFETY**

A. Under ISP code 04C01, inspection program personnel are to verify that poultry feet are wholesome and not adulterated and can bear the mark of inspection. In addition, in an establishment that chooses to use a batching system, inspection program personnel are to verify that the establishment is following its batch method procedures. Inspection program personnel will also verify that the establishment:

1. is maintaining sanitary conditions at all times during feet processing, chilling, and packaging; and

2. has considered whether there are any food safety hazards that are reasonably likely to occur in the production of feet eligible for the mark of inspection as part of the hazard analysis (see 9 CFR 417.2).

B. If inspection program personnel determine that sanitary conditions have not been maintained, or that adulterated product would enter commerce, they are to issue a Noncompliance Record (NR) and the the appropriate enforcement action as set out in FSIS Directive 5000.1, Revision 1.

## **IX. INSPECTION PROGRAM PERSONNEL VERIFICATION RESPONSIBILITIES RELATED TO NON-FOOD SAFETY CONDITIONS**

A. Under 04C01, inspection program personnel are to focus their verification of non-food safety conditions on reviews or observations of the establishment's procedures, process controls, or program to ensure that poultry feet are wholesome. An example of process control material that the establishment could use to document process control for the harvesting of young chicken feet is available at the following web site: [http://www.fsis.usda.gov/Regulations/6000\\_Series-Slaughter\\_Inspection/index.asp](http://www.fsis.usda.gov/Regulations/6000_Series-Slaughter_Inspection/index.asp).

B. Inspection program personnel are not routinely to examine poultry feet. Inspection program personnel may examine poultry feet:

1. in situations where they believe, based on their professional judgment, that the feet have an excessive amount of non-systemic defects that render the poultry feet adulterated under 21 U.S.C. 453 (g)(3), (i.e., "unsound, unwholesome, or otherwise unfit for human food"), **and**

2. the establishment does not have procedures, process controls, or programs in place to ensure that poultry feet are wholesome in such circumstances, **or**

3. If the establishment has failed to follow the procedures, process controls, or programs that it has established.

C. If inspection program personnel determine that unwholesome or adulterated product would enter commerce, they are to issue a non-compliance record (NR) indicating Noncompliance Trend Indicator G (Economic) and cite 9 CFR 381.79, and take appropriate regulatory control action, such as retention of product 9 CFR 500.2(a)(2).

## **XI. FURTHER GUIDANCE**

For technical guidance contact the TSC at 1-800-233-3935. For guidance related to regulatory activities refer questions through supervisory channels.

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